

JASON YEARY,
Plaintiff

vs.

FORD MOTOR COMPANY,
Defendant

10-cv-11076 (GAO)

The defendant Ford Motor Company (Ford) moves pursuant to Fed. R. Civ. P. 37(a)(3)(B) for entry of an order compelling the plaintiff to serve full and complete responses to Ford's First Set of Interrogatories to the Plaintiff Jason Yeary, Ford's First Request for Production of Documents to the Plaintiff Jason Yeary, and Ford's Request for Executed Medical Authorizations from the Plaintiff Jason Yeary to obtain a complete set of his medical records, within fifteen (15) days of the Court's Order.

For the foregoing reasons, Ford's motion to compel the plaintiff to serve discovery responses requiring the plaintiff to serve full and complete responses, and

return executed medical authorizations to Ford, within fifteen (15) days should be allowed.

LOCAL RULE 37.1 CERTIFICATION

The undersigned counsel certifies, pursuant to L. Civ. R. 37.1 that she has conferred with counsel for the plaintiff in a good faith attempt to narrow the areas of disagreement to the greatest extent possible. Plaintiff's counsel informed the undersigned counsel that he is unable to provide the requested discovery and therefore agreed that a motion seeking intervention from the Court is necessary.

FORD MOTOR COMPANY

By its Attorneys,

/s/ Michelle I. Schaffer

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CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2011 a copy of the foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail and first class mail to all parties.

Ralph Cafarelli, Esquire
Sullivan & Sullivan
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Wellesley, MA 02481

/s/ Michelle I. Schaffer

Michelle I. Schaffer-